

THE HONORABLE EDWARD F. SHEA

Stewart A. Estes, WSBA #15535
Kimberly J. Waldbaum, WSBA #31529
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

KYLE STIFFARM,

Plaintiff

v.

CITY OF PULLMAN POLICE
DEPARTMENT and ANDREW
WILSON,

Defendants.

No. CV 04-0414-EFS

SECOND STIPULATED
PROTECTIVE ORDER
REGARDING DOCUMENTS TO
BE PRODUCED BY
DEFENDANT CITY OF
PULLMAN

STIPULATION

COMES NOW Plaintiff, Kyle Stiffarm, and Defendants City of Pullman
and Andrew Wilson, by and through their undersigned counsel of record, and
stipulate as set forth below:

SECOND STIPULATED PROTECTIVE ORDER RE
DOCS TO BE PRODUCED BY CITY - 1
Cause No. CS-04-0214-FVS

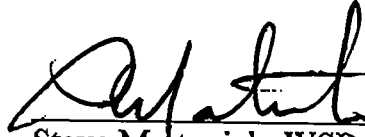
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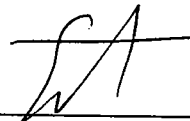
1 Dated this 3rd day of Aug, 2006.

2 SNYDER & MARTONICK LAW OFFICES

3 

4 Steve Martonick, WSBA #32213
5 Attorneys for Plaintiff

6 KEATING, BUCKLIN & McCORMACK,
7 INC., P.S.

8 

9 Stewart A. Estes, WSBA #15535
10 Kimberly J. Waldbaum, WSBA #31529
11 Attorneys for Defendants

12 **ORDER**

13 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that
14 certain documents produced by Defendants in Response to Plaintiff's Second
15 Interrogatories and Requests for Production, including Defendant Andrew
16 Wilson's job performance reviews and evaluations, will be disclosed pursuant
17 to the following provisions:

18
19 IT IS FURTHER ORDERED that the contents and/or existence of the
20 aforementioned documents and files and any part thereof or therein shall not
21 be disclosed in any manner or form to any person and/or entities other than the
22 parties, the parties' attorneys, experts retained by parties' attorneys, their
23 staffs, and other individuals as specifically herein provided.

24 SECOND STIPULATED PROTECTIVE ORDER RE
DOCS TO BE PRODUCED BY CITY -2

Cause No. CS-04-0214-FVS

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1 IT IS FURTHER ORDERED that the parties shall be allowed to use the
2 aforementioned documents or information in depositions of Plaintiff,
3 Defendants, and the parties' expert witnesses, or in consulting with any expert
4 witness in this case, subject to the conditions of the Protective Order.
5

6 IT IS FURTHER ORDERED that counsel for the Plaintiff shall use all
7 documents and information produced or disclosed pursuant to this Protective
8 Order solely for purpose of preparation for a trial of this action. Under no
9 circumstances shall Plaintiff and his counsel and experts disclose information
10 or materials covered by this Order to anyone other than as provided in this
11 Order. Nothing in this Order shall prohibit or restrict the Defendants from
12 using these records in the normal course of their business.
13

14 IT IS FURTHER ORDERED that any expert receiving documents
15 subject to this Order shall be provided with a copy of this Order and shall be
16 required to keep said information confidential and shall assure that his or her
17 staff keeps said information confidential.
18

19 IT IS FURTHER ORDERED that at the conclusion of this litigation,
20 Plaintiff's counsel will retrieve and return to counsel for the Defendants all
21 copies of all records and other documents produced by the Defendants
22 pursuant to this Order, including those provided to expert witnesses, no later
23 than thirty days from the date final order or judgment has been entered.
24

SECOND STIPULATED PROTECTIVE ORDER RE

DOCS TO BE PRODUCED BY CITY - 3

Cause No. CS-04-0214-FVS

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1 IT IS FURTHER ORDERED that all documents produced in discovery
2 pursuant to this Order shall be labeled "Confidential-Subject to Protective
3 Order."
4

5 IT IS FURTHER ORDERED that all documents produced pursuant to
6 this Order shall be submitted under seal, and designated "Confidential-Subject
7 to Protective Order."
8

9 IT IS FURTHER ORDERED that this Protective Order shall remain in
10 full force and effect until such time as this Court modifies its terms or releases
11 the parties from its provisions.
12

13 _____
14 _____
15 DONE IN OPEN COURT this 3rd day of August, 2006.
16

17 s/ Edward F. Shea

18 _____
19 Honorable Edward F. Shea
20 United States District Court Judge
21
22
23
24

SECOND STIPULATED PROTECTIVE ORDER RE
DOCS TO BE PRODUCED BY CITY -4
Cause No. CS-04-0214-FVS

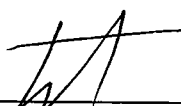
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1 Presented by:

2 KEATING, BUCKLIN & McCORMACK, INC., P.S.

3
4 
5 Stewart A. Estes, WSBA #15535
6 Kimberly J. Waldbaum, WSBA #31529
Attorneys for Defendants

7 Approved as to Form:

8 SNYDER & MARTONICK LAW OFFICES

9
10 
11 Steve Martonick, WSBA #32213
12 Attorneys for Plaintiff

13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on August 3, 2006, I electronically
15 filed the foregoing Second Stipulated Protective Order Regarding Documents
16 to be Produced by Defendant City of Pullman with the Clerk of the Court
17 using the CM/ECF system to the following participant: Steve Martonick.

18 s/Stewart A. Estes
19 Stewart A. Estes, WSBA #15535
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SECOND STIPULATED PROTECTIVE ORDER RE
DOCS TO BE PRODUCED BY CITY -5

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